

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,  
PATENT LITIGATION

Case No. 2:22-md-03042-JRG

THIS DOCUMENT RELATES TO CASE  
NO. 2:23-cv-00113-JRG

## **JURY TRIAL DEMANDED**

TAASERA LICENSING LLC,

Case No. 2:22-cv-00415-JRG

Plaintiff,

## JURY TRIAL DEMANDED

V.

FORTINET INC.

Defendant.

## **JOINT MOTION FOR A SECOND EXTENSION TO STAY OF ALL DEADLINES**

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Fortinet, Inc. (“Defendant” or “Fortinet”) (collectively, the “Parties”) file this Joint Motion for a Second Extension to Stay of All Deadlines in the above-captioned case.

All matters in controversy between the Parties have been settled in principle and, on December 14, 2023, the Parties jointly moved to stay all deadlines and provided notice of settlement (Dkt. 340). On the same day, this Court stayed the case thirty-five (35) days until January 19, 2024 (Dkt. 343). On January 16, 2024, the parties filed their first Joint Motion to Extend the Stay of All Deadlines for thirty (30) days (Dkt. 350) (“First Extension”). On January 18, 2024, the Court granted the Parties’ First Extension until February 20, 2024 (Dkt. 351), while the parties finalized the settlement agreement.

The Parties respectfully and jointly request that the Court extend the stay of all case deadlines between Taasera and Fortinet for an additional fourteen (14) days for the parties to collect signatures and prepare dismissal papers.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: February 20, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

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***ATTORNEYS FOR FORTINET INC.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on February 20, 2024 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant

Alfred R. Fabricant